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August 11, 2008

VIA FACSIMILE

Honorable Cathy Seibel
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: Newmark v Lawrence Hospital et al.
07 Civ 2861 (CS)

Dear Judge Seibel:

On consent of the Defendants, Plaintiff requests an extension of time for the first time in which to oppose Defendants' Motion for Summary Judgment. We respectfully request that Plaintiff's time to oppose the motion be extended from August 11, 2008 to September 2, 2008, Defendants' time to reply be extended to September 16, 2008 and if needed, oral argument be adjourned to September 26, 2008 at 10:00 a.m.

The reason for Plaintiff's request is that Plaintiff's counsel has a number of other matters which have been due and/or will be due shortly, including oppositions to motions in the cases of Kempkes v. Marvin, 07 Civ. 11351 (KMK), Alali v. Gazzolla, 07 Civ. 2916 (CS), Amorosano-LePore v. Generoso, et al., 06 Civ 1223 (WCC) and depositions in Heitzner v. Furlong, 07 Civ. 6699 (KMK) and Furlong v. Heitzner, 07 Civ. 3825 (KMK) which are scheduled over five separate days in the next two weeks.

Respectfully,

Drita Nicaj
Drita Nicaj

cc: John Keil, Esq. (via facsimile)

